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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NICHOLAS SNIDER and LAUREN SNIDER,
Individually and as Special Administrators of the
ESTATE OF ISALAH SHARP, Deceased,

Case No. 2:22-cv-01723-RFB-MDC

Plaintiffs,

v.

**STIPULATION TO AMEND
DISCOVERY PLAN AND
SCHEDULING ORDER SUBMITTED
IN COMPLIANCE WITH LR IA 6-1 and
LR26-3 (THIRD REQUEST)**

STATE OF NEVADA, on relation of the
NEVADA DEPARTMENT OF CORRECTIONS;
CHARLES DANIELS, individually and
as Director of the Department of Corrections;
WILLIAM QUENGA, individually and as Deputy
Director of the Department of Corrections;
BRIAN WILLIAMS, individually and as Deputy
Director of Operations of the Department of
Corrections; JAMES JONES, individually and as
Inspector General of the Department of
Corrections; WILLIAM GITTERE, individually
and as Deputy Director of Programs of the
Department of Corrections; CALVIN JOHNSON,
individually and as Warden at High Desert State
Prison; JEREMY BEAN, individually and as
Associate Warden at High Desert State Prison;
FRANK DREESEN, individually and as
Associate Warden at High Desert State Prison;
GARY PICCININI, individually and as Associate
Warden at High Desert State Prison; RONALD
OLIVER, individually and as Associate Warden at
High Desert State Prison; DOE OFFENDER
MANAGEMENT ADMINISTRATOR (DOE
OMA); DOES I-X, inclusive; BLACK AND
WHITE COMPANIES I-X, inclusive; ABC
CORPORATIONS, I-X, inclusive

Defendants.

The parties hereto, by and through their respective undersigned counsel, in compliance with the

1 Court's Scheduling Order hereby files this Stipulation to extend discovery dates.

2 The parties have been diligent in conducting discovery. Since the first request to extend
3 discovery several more depositions have been taken which have resulted in additional depositions
4 needing to be taken, including depositions of witnesses who have needed Subpoenaed. Once such
5 witness that is important to the case has moved since the last known address was given by
6 Defendants to Plaintiffs. Plaintiff has continued to be diligent in tracking this witness with three
7 different leads that have all resulted in failed attempts of service. Plaintiff is continuing to try and
8 obtain a current address for this witness. Additionally, four other depositions were conducted since
9 the last extension. Both sides have served written discovery upon the parties. The current deadline
10 for the Expert disclosure is March 7, 2024 and the parties feel that more time is needed for the
11 additional depositions to be taken and probable additional written discovery.

12 **DISCOVERY PLAN & SCHEDULING ORDER**

13 Plaintiffs and Defendants hereby agree and stipulate as to the following discovery plan:

- 14 1. DISCOVERY CUT-OFF DATE. The new Discovery Cut-off date shall be 120 days
15 from the current discovery cut-off of May 6, 2024 which shall be **(September 3, 2024)**.
- 16 2. LAST DAY TO AMEND PLEADING AND/OR ADD PARTIES. The last day to
17 amend pleading and/or add parties will be (90) days prior to the Discovery Cut-off date
18 which shall be **(June 5, 2024)**.
- 19 3. LAST DAY TO EXTEND DISCOVERY. The last date to request an extension for
20 the discovery in this matter will be (20) days prior set for the Discovery Cut-off in this matter
21 **(August 14, 2024)**.
- 22 4. DISCLOSURE OF EXPERTS. The last day for disclosing experts will be sixty (60)
23 days before the close of discovery **(July 5, 2024)**.
- 24 5. INTERIM STATUS REPORT. **No longer required. See updated local rules.**
- 25 6. REBUTTAL EXPERTS. The last day for disclosing rebuttal experts shall be thirty-
26 one (31) days after expert disclosure deadline **(Monday, August 5, 2024)**.

7. DISPOSITIVE MOTIONS. The last date for filing dispositive motions shall be no later than thirty-two (32) days before the close of discovery (**Friday, August 2, 2024**).

8. PRE-TRIAL ORDER. The Joint Pre-trial Order shall be filed no later than thirty-two (32) days after the deadline for dispositive motions (**September 3, 2024**).

9. F.R.C.P. 26(A)(3) DISCLOSURES. The disclosures required by F.R.C.P. 26(a)(3) and any objections thereto shall be included in the Pre-trial Order.

Dated this 6th day of March, 2024.

Dated this 6th day of March 2024.

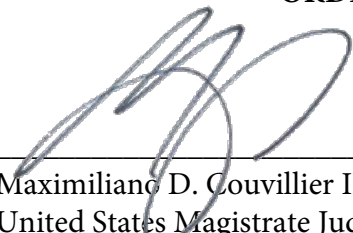
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ORDER



Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 3/7/24